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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**Bankruptcy Case No. 19-30088 (DM)**

**PG&E CORPORATION,**

Chapter 11

- and -

**(Lead Case) (Jointly Administered)**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

## Debtors.

- Affects PG&E Corporation
  - Affects Pacific Gas and Electric Company
  - Affects both Debtors

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO ONE HUNDRED  
FIFTEENTH OMNIBUS OBJECTION TO  
CLAIMS AND REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTIONS**

[Re: Dkt. No. 12173]

**Regarding Objections Set for Hearing  
June 7, 2022, at 10:00 a.m. (Pacific Time)**

## **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the following omnibus claims objection (the “**Omnibus Objection**”):

Docket Number	Omnibus Objection
12173	<i>Reorganized Debtors' One Hundred Fifteenth Omnibus Objection to Claims (No Liability Recategorized Claims)</i> (the "Omnibus Objection")

## **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibits 1-3 to the Omnibus Objection.

## **NOTICE AND SERVICE**

The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection [Docket No. 12176]. The Omnibus Objection was also supported by the declaration of A. Anna Capelle [Docket No. 12174] (the “Declaration”) and the Request to Take Judicial Notice [Docket No. 12175] (the “RJN”). The Omnibus Objection, the Notice of Hearing, the Declaration, and the RJN were served as described in the *Certificate of Service of Sonia Akter*, filed on April 21, 2022 [Docket No. 12205]. Each holder of a claim listed on Exhibits 1-3 to the Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Omnibus Objection has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Informal	Adame, Martin	57319 105862	Counsel for the Reorganized Debtors received a voicemail from Claimant regarding the Omnibus Objection on May 13, 2022. Counsel left return voicemails for Claimant on May 13, 2022 and May 31, 2022 and has not yet received a response. Accordingly, the hearing on the Omnibus Objection with respect to these Claims will be continued to July 12, 2022.
Informal	Miller, Kim	87604	Counsel for the Reorganized Debtors received an informal response to the Omnibus Objection on May 24, 2022. The Reorganized Debtors are discussing with Claimant and investigating the response. Accordingly, the hearing on the Omnibus Objection with respect to this Claim will be continued to July 12, 2022.
Informal	Reichenthal, Sara	83459	Counsel for the Reorganized Debtors received a voicemail from Claimant regarding the Omnibus Objection on April 26, 2022. Counsel spoke with Claimant by telephone on May 5, 2022 and explained to her that the Reorganized Debtors were not liable for Southern California Edison claims. Claimant indicated that she understood. Accordingly, the Reorganized Debtors request that the Omnibus Objection be sustained with respect to Claim No. 83459.
Informal	Richards, Stephen	5548	Counsel for the Reorganized Debtors received an informal response to the Omnibus Objection on April 25, 2022. The Reorganized Debtors are discussing with

Docket No.	Claimant	Claim No.	Resolution
			Claimant and investigating the response. Accordingly, the hearing on the Omnibus Objection with respect to this Claim will be continued to July 12, 2022.
12377	Walters, Andrew	86837	Claimant filed his response on May 12, 2022. Counsel for the Reorganized Debtors is investigating the response, and has left voicemails for Claimant on May 17, 2022 and May 25, 2022. No response has been received to date. Accordingly, the hearing on the Omnibus Objection with respect to these Claims will be continued to July 12, 2022.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and/or expunging the Proofs of Claim listed in Exhibit A to this Request, which listed Claims are identical to those listed in Exhibits 1-3 to the Omnibus Objection, except as otherwise discussed above.

Dated: May 31, 2022

**KELLER BENVENUTTI KIM LLP**

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors and Reorganized Debtors*